Exhibit I

L Nui		Privilege Type	Date Email From	Email To Email CC	Title	Privilege Description	Privilege Challenged Basis
	REL-00004081	Work Product	11/5/2021		Map Room Schedule 2021.xlsx	Confidential spreadshect created and maintained by legal counsel containing attorney thoughts and impressions of redistricting process.	This document is not attenes work product. It was not draft in "ancipation of litigation" but over the "ordinary course of" legislation. Bethun-ellil v. To State B. of Election. 114 F. Supp. 3423.34 (E.D. Va. 2015) (quoting Hickman, Taylor, 23 QUS, SS0-10 (1497)); see Fel. R. Civ. P. 26(b)(3) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of litigation or for trial by or for another party or its representative. Courts have been calcular that occuments pertaining to legislation cannot be withheld on the basis of atteney work product because "the legislature could always have a reasonable belief that any of its enatures the legislature (some first in the surface of the legislature) (and the source) (and the product because "the legislature could always have a reasonable belief because "the legislature of the source of the distriction in the process" (a distriction intellegislative function even though it occurs every 109 ass. As a result, the "the driving force behind the preparation of "this document" is for legislation, not litigation. Nat'l Union for lost. Co. of Pittsburgh v. Marrary Sheet Metal Co. 967 F.2 d 980, 984 (4th Cir. 1992). This would not include "business or technical advice or management decisions." Pere v. Perv. 2014 WIL 3359324, at "1 (W.D. Tx. July 9, 2014) (citains semitted); Rule 26 Advisory Comm.' Notes to 1970 amendment ("Materials assembled in the ordinary course of business, or pursuant to public requirements unrelated to litigation, or for other nonlitigation purposes are not under the qualified immunity provided by this subdivision.").
	REL00011529	Attorney-Client Communication	11/10/2021 Joseph S. "Joe" Daning	Émma Dean Joseph S. "Joe" Daning	Amendment for House Dist. 92	Confidential request from legislator to staff counsel for legal assistance with drafting amendment to legislation.	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only applies if, among other things, the person asserting the privilege is the client and the attorney is "acting as a lawyer." Bethinse-Hill, 114 F. Supp. 3d at 346 (quoting United States v. Jones, 696 Fe 2d 1069, 1072 (4th Cir. 1822). House Defendants have not produced a retainer staining that an attorney-client relationship exists between counsel and the legislator. Further, House Defendants fail to provide sufficient evidence to determine if this communication was for the prodominate purpose of legal advice rather than policy advice. Citizens Union of City of N.Y. v.Atty Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017).
	REL00011642	Attornsy-Client Communication; Work Product	11/9/2021 Emma Dean	Neal Collins	PW-PRIVILEGED & CONFIDENTIAL Talking Points and Primer	Confidential email from attorncy to client conveying legal advice and supporting documentation regarding public hearings.	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is marrowly construed, and applies if, among onch trilings, the person asserting the privilege is the client and the attorney is "acting as a laways". Bedunes-Hill, 114 F. Supp. 3d at 346 (quoting United States v. Anne., 606 F. 2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between counsel and the legislator. Further, House Defendants have not produced a retainer stating that an attorney-client relationship exists between counsel and the legislator. Further, House Defendants fail to provide sufficient evidence to determine if this communication was for the prodominate purpose of legal salvice ruther than policy advice. Citizens Union of (2th of NA, valv) Gen. of NY, 269, F. Supp. 3d 124, 317 (S. D.N.Y. 2017). The latter would not be protected by the attempor client privilege. Id. This document is not attorney work product. It was not draft in "uncipation of litigation" but over the "ordinary course of" legislation. Bethum-Filli v. Va State Bd. of Electrical 114 E. Supp. 3d 233, 348 (E. D. Va. 2015) (quoting Hickman v. Taylor, 250 U.S., 508-10) (1947); see Fold. Ev. Dv. 26(b)(3) (emphasis added) (the work product product protection is a qualified privilege for "documents and unapible things that are prepared in naticipation of fitting by or for another party or its representative."). Courts have been clear that documents pertaining to legislation cannot be withheld on the basis of attorney work product because "the legislative round always have a reasonable belief that any of its examents would be read in Hitigation. That is the nature of the legislative process." Id. (internal exits omitted) (quoting Baldus vs. Permana, 2011 WL 6385645, at *2 (E.D. Wis. Dec. 20, 2011)). The "redistricting process" is a quintessential legislative function even though the readour product and produce and the produce of the legislative pro
	1	Attorney-Client Communication; Work Product	11/9/2021		11.9.2021 Meeting Talking Points.pdf	Attorney's confidential work product containing mental impressions, opinions, and legal advice regarding public hearings.	Same
		2 Attorney-Client Communication; Work Product	11/9/2021		11.9.2021 Law Primer.pdf	Attorney's confidential legal research on redistricting law and attorney mental impressions on the same to client in preparation of public hearing.	Same

Line	Control Number	Privilege Type	Date	Email From	Amended Privilege Log Email To	Email CC	Title	Privilege Description	
Number									Privilege Challenged Basis
6	REL00011643	Attorney-Client Autorney-Client Autorney-Client	11/9/2021	Emma Dean	Jason Elliot		FW: PRIVILEGED & CONFIDENTIAL Talking Points and Primer 11.9.2021 Meeting Talking Points pdf	Confidential email from attorney to client conveying legal advice and supporting documentation regarding public hearings. Attorney's confidential work product containing mental	An atomory client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only applies if, among other things, the person asserting the privilege is the client and the attorney; is exting as a lawayer. *Beatume.*III. 14 F. Supp. 3d at 346 (quoting *United Nature v. Jones.* 606 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an atomory-client relationship exists between counsel and the legislator. Further, Hosue Defendants fails to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. *Citizens Union of City of N. V. v. 4th; Gen. of N. Y. 200, F. Supp. 3d 23, 348 (E.D. V. a. 2015) (quoting Hickman v. Taylor, 230 U.S., 508.10 (1947)); see Fed. R. C. tv. P. 26(b)(3) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of Itigation or for trial by or for another party or its representative."). Courts have been clear that documents pertaining to legislation cannot be withfield on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its legislation cannot be withfield on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its legislation cannot be withfield on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its legislation cannot be withfield on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its legislation cannot be withfield on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its legislation as the string of the legislation process." Id. (internal cliss omitted) (quoting Bladas v. Brenana, 2011 WL 6385645, at "2 (E.D. Wis. Dec. 20, 201
7		Communication; Work Product	11/9/2021				11.9.2021 Investing Tailoring Tollies.pdf	impressions, opinions, and legal advice regarding public hearings.	Salit.
8	REL00011643.0002	Communication; Work Product Attorney-Client		Emma Dean	Weston Newton			Attorney's confidential legal research on redistricting law and attorney mental impressions on the same to client in preparation of public hearing. Confidential email from attorney to client conveying legal advice	Same
9		Attorney-Client	11/9/2021	Lamina Dean	vessori vessori		Talking Points and Primer	and supporting documentation regarding public hearings. Attorney's confidential work product containing mental	An atomory client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only upplies if, among other things, the person asserting the privilege is the client and the attorney; "nesting as a lawyer," Behume-Jill, 114 F. Supp. 3d at 346 (quoting United States v. Jone.; 606 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an atomory-client relationship exists between counsel and the legislator. Further, Hosue Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. Citizens Union of City of N.V. v. 4th y Gen. of N.Y. 269, F. Supp. 3d 23, 348 (E.D. Nz. 2015) (guoting Hickman v. Taylov, 239 U.S., 508.10 (1947)); see Feld. R. C. Nr. 2. 50(5)(5) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of Itigation for for atother party or its representative."). Courts have been clear that documents pertaining to legislation cannot be withheld on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its enactments would result in thigation. That is the nature of the legislature process." Id. (internal clists omitted) (quoting Bladtsus v. Branna, 2011 WL 6385645, at *2 (E.D. Wis Dec. 20, 2011)). The "redistricting process" is a quintiessential legislative function even though it occurs every 10 years. As a result, the "the driving frorce behind the preparation of this document' is for legislation, not Itligation. Nat Union fire Ins. Co. of Pitiburgh v. Murray Sheet Metal Co., 967 F2d 980, 984 (4th Cri. 1992). This would not include "buisness or technical advice or management decisions." Perez v. Perez, 2014 WL 335924, at *1 (W.D. T., July 9, 2014) (clistions on mitted; Rule of Advisory Comm.) Notes to 1970 amendment ("Materials assembled in the ordinary course of busi
10		Communication; Work Product						impressions, opinions, and legal advice regarding public hearings.	Same
11	REL00011644.0002	Attorney-Client Communication; Work Product	11/9/2021				11.9.2021 Law Primer.pdf	Attorney's confidential legal research on redistricting law and attorney mental impressions on the same to client in preparation of public hearing.	Same
12	REL00011645	Work Product		Emma Dean	Jason Elliot		Submissions	Confidential email from attorney to client conveying legal advice and supporting documentation regarding public map submissions and public hearings.	his document is not attorney work product. It was not drift in "ancipation of litigation" but over the "ordinary course of" legislation. Bethause Hill v 1a State Bd. of Election. 114 F. Supp. 3d 323, 348 (E.D. Va. 2015) (quoting Hickman v. Taylor, 329 U.S., 508-10 (1947)); see Fed. R. Civ. P. 26(b)(3) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in amicipation of litigation or for trial by or for another party or its representative.") Court have been clear that documents pertaining to [seglistation cannot be withheld oft in the basis of atteney work product because "the legislature could always have a reasonable belief that any of its enactments would result in litigation. That is the nature of the legislative process." Id. (internal edits omitted) (quoting Baldau v. Brennan, 2011 W. 685864, at "2 (E.D. Wis. Dec. 20, 2011)). The "redistricting process" is quintessental legislative function even though it occurs every 10 years. As a result, the "the driving force behind the preparation of" this document" is for legislation, not litigation. Nart Union fee Iss. Co. of Pathsaplay's Marray Nest Med 126, op 87 E 249 80, 98 44 (the Cir. 1992). This would not include "bainess or terbuland advice or management decisions." Pere v. Perry, 2014 W. 3359324, at "1 (W.D. Tx. July 9, 2014) (citaions omitted); Rule 26 Advisory Comm.'s Notes to 1970 another the qualified immunity provided by this subdivision.").
13	REL00011645.0001		11/10/2021				LOWV Map.PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
14	REL00011645.0002		11/10/2021				Michael Roberts Map.PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
15	REL00011645.0003	Work Product	11/10/2021				NAACP Map.PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same

						og of House Defendants			
Line Number	Control Number	Privilege Type	Date	Email From	Email To	Email CC	Title	Privilege Description	Privilege Challenged Basis
16	REL00011645.0004	Work Product	11/10/2021	i			Erica Sampson Map (HD-4).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
17	REL00011645.0005	Work Product	11/10/2021	I			Jeni Atchley (HD-5).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
18	REL00011645.0006	Work Product	11/10/2021				John Kraljevich (HD-6).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
19	REL00011645.0007	Work Product	11/10/2021	i			Kevin Eckert Map (HD-7).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
20	REL00011645.0008	Work Product	11/10/2021				Statistical Comparison.pdf	Confidential document created in anticipation of litigation by attorney summarizing public submissions with attorney mental impressions and opinions.	Same
21	REL00011646	Work Product	11/10/2021	Emma Dean	Neal Collins		FW: Privileged and Confidential - Public Submissions	Confidential email from attorney to client conveying legal advice and supporting documentation regarding public map submissions and public hearings.	Same
22	REL00011646.0001	Work Product	11/10/2021				LOWV Map.PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
23	REL00011646.0002	Work Product	11/10/2021				Michael Roberts Map.PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
24	REL00011646.0003	Work Product	11/10/2021	I			NAACP Map.PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
25	REL00011646.0004	Work Product	11/10/2021				Erica Sampson Map (HD-4).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
26	REL00011646.0005	Work Product	11/10/2021				Jeni Atchley (HD-5).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
27	REL00011646.0006		11/10/2021				John Kraljevich (HD-6).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
28	REL00011646.0007		11/10/2021				Kevin Eckert Map (HD-7).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
29	REL00011646.0008		11/10/2021				Statistical Comparison.pdf	Confidential document created in anticipation of litigation by attorney summarizing public submissions with attorney mental impressions and opinions.	Same
30	REL00011647	Work Product		Emma Dean	Weston Newton		Privileged and Confidential - Public Submissions	Confidential email from attorney to client conveying legal advice and supporting documentation regarding public map submissions and public hearings.	Same
31	REL00011647.0001		11/10/2021				Statistical Comparison.pdf	Confidential document created in anticipation of litigation by attorney summarizing public submissions with attorney mental impressions and opinions.	Same
32	REL00011647.0002		11/10/2021				Michael Roberts Map.PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
33	REL00011647.0003		11/10/2021				NAACP Map.PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	Same
34	REL00011647.0004		11/10/2021				Erica Sampson Map (HD-4).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	
35	REL00011647.0005		11/10/2021				Jeni Atchley (HD-5).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	
36	REL00011647.0006 REL00011647.0007		11/10/2021				John Kraljevich (HD-6).PNG Kevin Eckert Map (HD-7).PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.	
37	REL00011647.0007		11/10/2021				LOWV Map.PNG	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation. Confidential image of publicly submitted maps created by attorney	Same Same
38	REL00011647.0008				Chris Moraha		•	with overlays to convey legal advice in preparation of litigation.	
39	RELUUU11661	Attorney-Client Communication	9/3/2021	Emma Dean	Chris Murphy		Attorney Communication Privileged	Confidential communication from attorney to client with draft work product response to public letter for client's review.	An attorney-client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only applies if, among other things, the person asserting the privilege is the client and the attorney; is "acting as a lawyer," <i>Behame-Hill</i> , 114 F. Supp. 3d at 346 (quoting United States v. Jones., 608 F. 2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an automey-client relationship exists between counsel and the legislator. Further, Hosue Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. Citizens Union of City of N.Y. v. aftry Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017). The latter would not be protected by the attorney client privilege. Id.
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Line		Privilege Type	Date Email From	Email CC Email CC	Title	Privilege Description	Privilege Challenged Basis
40	REL00011661.0003	Work Product	9/3/2021		Daft Letter from Ch. Murphy 9.3.21.docx	Attachment to attorney communication to client with draft work product response to public letter for client's review.	This document is not attorney work product. It was not draft in "ancipation of litigation" but over the "ordinary course of" legislation. Bethun- lilly Va State Bot Offection, 114 F. Supp. 3.23 3.34 (E.D. Va. 2015) (quoting Hickman, Yzifor, 3.2014), Sos-Bot (1947); wee Fed. R. Civ. P. 26(b)(3) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of litigation or for trial by or for another party or its representative."). Courts have been clear that documents pertaining to legislation cannot be withheld on the basis of attorney-work product because "the legislature could always have a reasonable belief that any of its enactments would result in litigation. That is the nature of the legislative process." Id. (internal edits omitted) (quoting Baldus v Bernama, 2011 Wd. 638645, at "2 (E.D. Wis. Dec. 20, 2011)). The "redistricting process" is a quaintessential legislative function cover though it occurs every 10 years. As a result, the "the driving force behind the preparation of "this document" is for legislation, not litigation. Nat' Union for lite. Sco. Of Pluthunghy's Murray Mest Med Ide., Op. 67 E.24 980, 984 (4th Cir. 1992). This would not include "business or terbuical advice or management decisions." Power v. Perry, 2014 WL 3359224, at "1 (W.D. Tx. July 9, 2014) (citainso smitted); Rule 26 Advisory Comm.'s Notes to 1970 amendment ("Materials assembled in the ordinary course of business, or presument to public requirements unrelated to litigation, or for other nonlitigation purposes are not under the qualified immunity provided by this subdivision.").
41	REL00011667	Attorney-Client Communication	9/27/2021 Emma Dean	Jay Jordan	Sept 28 contact talking points	Confidential communication between attorney and client providing legal advice for public meeting.	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is 'marrowly construed' and only applies if, among other things, the person asserting the privilege is the client and the attorney; si-meting as a lawayer. Bethause-Hill, 114 F. Supp. 3d at 346 (quoting United States v. Jones, 606 F. Zd 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between consuel and the legislator. Further, House Defendants fall to provide sufficient evidence for determine if this communication was for the predominate purpose of legal advice rather than policy advice. Citizens Union of City of N.Y. v.Atr'y Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017).
42	REL00011667.0001	Attorney-Client Communication; Work Product	9/27/2021		Sept 28 contact talking points.docx	Attachment from attorney with document providing attorney mental impressions/opinions and legal advice for public meeting.	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly, construct" and only applies if, among other things, the person asserting the privilege is the client and the attorney is "acting as a lawyer." Behan-Hill. 114 F. Supple 3d a 346 (quoting Dirette States v. Jones, 606 F.2d 1669, 1072 (4th Cir. 1982)). Howe Defendants fail to provide sufficient evidence to electrinic if this communication was for the preclominate purpose of legal advice matter than policy advice. Clitzens Union of 10° nof N. 2. Any Gen of N. Y., 280, F. Supp. 3d 24; 171 (S.D.N. 2017). This document is not attorney work product. It was not drain in analysis on linguistion but over the "columny course of" legalation. Behinne-Hill v. Va State Bd. of Election, 114 F. Supp. 3d 323, 348 (E.D. Va. 2015) (quoting Hickman v. Taylor, 329 U.S., 308–10 (1947)); see Fed. R. Cir. P. 26(6)(3) (emphasis added) (the work product product product protect protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of litigation or for trial by or for another party or its representative.") Courts have been clear that documents pertaining to legislation cannot be withheld on the basis of attorney work product because: The legislature could always have a reasonable belief that any of its enactments would result in lingation. That of the decision of the product because: The direction of the control of the product of the document is for legislation, protecting and product of the document is for legislation, and the signation. Nart Union fire Inc. Co. of Pitzubugh v. Murroy Stee Medal Co., 647 F.2d 980, 984 (dt. Cir. 1992). This would not include "businesses or technical advice or management decisions." Perez v. Perry, 2014 W. 2355924, at 1" (W. D. T. z. July 2-102) (cliainos smithed) knowled advices or in product advice or management decisions." Perez v. Perry, 2014 W. 2355924, at 1" (W. D. T. z. July 2-102) (cliainos smithed) knowled advices or manage
43	REL00011670	Attorney-Client Communication	10/8/2021 Emma Dean	Chris Murphy	Atty client communication	Confidential communication from attorney to client with draft work product response to public letter for review.	An attorney client relationship does not exist among the individuals in the email. The attorney-elient privilege is "narrowly construed" and only applies if, among other things, the person asserting the privilege is the client and the attorney is "acting as a lawyer." Bethune-Hill, 114 F. Supp. 3d at 346 (quoting United States v. Jones, 606 F.2.1 006), 1072 (4th Cir. 1892). House Defendants have not produced a retainer staing that an attorney-client relationship exists between counsel and the legislator. Further, House Defendants fail to provide sufficient evidence to determine this communication was for the predominate purpose of legal advice rather than policy advice. Citizens Union of City of N.Y. v.Atry Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017).
44	REL00011670.0001	Attorney-Client	10/8/2021		Proposed Response to September	Attachment to attorney communication to client with draft work	Same

					Amended Privilege Lo	g of House Defendants			
Line Number	Control Number	Privilege Type	Date	Email From	Email To	Email CC	Title	Privilege Description	Privilege Challenged Basis
45	REL00019575	Work Product	12/1/2021	Emma Dean	Ashley Harwell-Beach		Amendment	Confidential communication between staff counsel regarding legislative drafting of amendments.	This document is not attoney work product. It was not draft in "ancipation of litigation" but over the "ordinary course of" legislation. Bethune-lill v. Was talled of lelection, 114 F. Supp. 3423, 348 (E.D. Va. 2015) (quoting Hickman, Yalyor, 320 Us.), 580-10 (1497)); see Fed. R. Civ. P. 260(37) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of litigation or of trail by or for another party or its representative."). Courts have been clear that documents pertaining to legislation cannot be withheld on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its enactments would result in litigation. That is the nature of the legislature process." It direntanel dists omitted (quoting Baldus x Pernana, 2011 Wt. 6385645, at "2 (E.D. Wis. Dec. 20, 2011)). The "redistricting process" is a quintessential legislative function even thought it occurs every 10 years. As a result, the "the driving force behind the preparation of this document" is for legislation, on thighting to the process of the proces
46	REL00019575.0001	Attorney-Client Communication; Work	12/1/2021				12.1 Draft Language.docx	Attachment to communication between staff counsel with draft amendment language.	Same
		Product							
47	REL00019618	Work Product	12/8/2021	Emma Dean	Ashley Harwell-Beach		Compare Result 5	Confidential communication between staff counsel regarding legislative drafting and change in versions of legislation. Attachment to communication between staff counsel regarding	This document is not attorney work product. It was not draft in "ancipation of litigation" but over the "ordinary course of legislation. Bething-lift V: As Suate Bod of Election, 114 F. Supp. 3d 23, 24 8 (E.D. Va. 2015) (quoting Hickman, Yrafon, 23 024), 508-10 (1947)), see Fed. R. Civ. P. 26(b)(3) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of litigation or for trail by or for another party or its representative.). Courts have been calcular that counters pertaining to legislation cannot be withheld on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its enatements would result in litigation. That is the nature of the legislature protess." Id. (internal clois omitted) (quoting Bullata v. Breman, 2011 WL 6385645, at *2 (E.D. Wis. Dec. 20, 2011)). The "redistricting process" is a quintessential legislative function even though it occurs every 10 years. As a result, the "the driving force behind the preparation of "this document" is for legislation, not litigation. Nat'l Urion fire Ins. Co. of Pittsburgh's Murray Sheet Metal Co., 967 F.2.d 980, 984 (4th Cir. 1992). This would not include "buisness or technical advice or management decisions." Peer v. Perv. y 2014 WL 339724, at "1 (WD. Ts. July y. 2014) (clainso smitted); Bute 26 Advisory Comm's Notes to 1970 amendment ("Materials assembled in the ordinary course of business, or pursuant to public requirements unrelated to litigation, or for other nonlitigation purposes are not under the qualified immunity provided by this subdivision.").
48	REL00019618.0001	Work Product	12/8/2021				Compare Result 5.docx	Attachment to communication between staff counsel regarding legislative drafting showing changes in legislation language.	Same
49	REL00019630	Work Product	12/8/2021	Emma Dean	Ashley Harwell-Beach		Re: Redistricting Act	Confidential communication between staff counsel regarding legislative drafting.	Same
50	REL00019630.0001	Work Product	12/8/2021				4493AHB21.pdf	Attachment to communication between staff counsel regarding legislative	Same
	REL00019984	Attorney-Client	11/11/2021	Jason Elliott	Emma Dean		District 31	Confidential communication from legislator to staff counsel	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only
51		Communication						requesting legal advice and attorney opinion for redistricting efforts related to District 31.	3d at 346 (quoting United States v. Jones, 696 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between conusel and the legislator. Further, House Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. Citizens Union of City of N.Y. v.Att'y Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017). The latter would not be protected by the attorney client privilege. Id.
52	REL00020087	Attorney-Client Communication	11/15/2021	Beth Bernstein	Emma Dean; Patricia Hengan; Justin Bamberg; Wallace Jordan; Weston Newton	Jimmy Hinson; Roland Franklin; Linda Anderson; Neal Collins; Jason Elliot	Redistricting	Confidential communication from legislator to staff counsel requesting answers to legal questions related to redistricting.	An attorney client relationship does not exist among the individuals in the entail. The attorney-elient privilege is "narrowly construct" and only applies if, among other things, the person asserting the privilege is the client and the attorney is "action gas a lawyer." Bethune Full, 114 F. Supp. 3d at 346 (quoting United States v. Jones, 696 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer staing that an attorney-client relationship exists between counsel and the legislator. Further, House Defendants fail to provide sufficient evidence to determine if this communication was for the preclominate purpose of legal advice enther than policy advice. Citizens fulnoin of (Fin of N.Y. v.Atry Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017). The latter would not be protected by the attorney client privilege. Id.

					Amended Privilege Log	of House Defendants			
Line Number	Control Number	Privilege Type	Date	Email From	Email To	Email CC	Title	Privilege Description	Privilege Challenged Basis
53	REL00020355	Attornsy-Client Communication	9/24/2021	Chris Murphy	Emma Dean		Re: Updated draft	Confidential communication from client to attorney regarding changes to draft document related to map room procedures.	An attorney-client relationship does not exist among the individuals in the email. The attorney-client privilege is 'narrowly construed' and only applies if, among other things, the person assecting the privilege is the client and the attorney is 'arting as a lawyer 'Berlune-lill,' 1.14 F. Supp. 3d at 346 (quoting United States v. Jones, 696 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between counsel and the legislator. Further, Hosue Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. Criticans Union of City of N.T. v. Arty Gen. of N.F., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017).
54	REL00020441	Work Product		copier@sestatehouse.gov	Emma Dean		Scanned image from MX-6070N	Scan transmission for staff counsel file.	This document is not attorney work product. It was not draft in "ancipation of litigation" but over the "ordinary course of "legislation. Bethune-Hill v To Xust Bed of Election, 114 F. Supp. 3d 323, 34 (E. D. V. ac) 105 (quoting Hickmann v. Tuylor, 329 U.S., 508-10 (1947)); see Fed R. Civ. P. 26(b)(3) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of litigation or for trial by or for another party or its representative." Courts have been clear that documents pertaining to legislation cannot be withheld on the basis of attorney work product because "the legislature could always have a reasonable belief atta any of its enactments would result in litigation. That is the nature of the legislation process." Id. (internal cids its mitted) (quoting Baldus v. Breman, 2011 WL 635645, at *2 (E.D. Wis. Dec. 20, 2011)). The "redistricting process" is a quintessential legislative function even though it occurs every 10 years. As a result, the "the driving force behind the preparation of" this document" is for legislation, not litigation with Various fire last. Co. of Pittsburgh v. Murray Sheet Metal Co., 967 F.20 980, 984 (4th Cir. 1992). This would not include "buissess or technical advice or management decisions." Perez. Perez. Post IV Ast 3339324, at *1 (U.D. Tx. July 9, 2014) (citations omittely, Rule 26 Advisor, Rule 26 advisor, Comm.'s Notes to 1970 amendment ("Materials assembled in the ordinary course of business, or pursuant to public requirements unrelated to litigation, the ordinary course of business, or pursuant to public requirements unrelated to litigation, the ordinary course of business, or pursuant to public requirements unrelated to litigation, the ordinary course of business, or pursuant to public requirements unrelated to litigation, the ordinary course of business, or pursuant to public requirements unrelated to litigation, the ordinary course of business, or pursuant to public requirements unrelated to
	REL00020441.0001	Work Product	10/1/2021				BL302Copier_20211001_143826.pdf	Scan for staff counsel file (scan of Row 1 on this Log).	This document is not attorney work product. It was not draft in "ancipation of litigation" but over the "ordinary course of" legislation. Bethune-
55									Hill V in State Bd. of Election. 114 F. Supp. 3d 323, 348 (E.D. Va. 2015) (quoting Hickman v. Taylor, 329 U.S, 508-10 (1947)); see Fed. R. Civ. P. 26(b)(3) (emphasis added) (the work product protection is a qualified privilege for "documents and tangible things are prepared in anticipation of litigation or for trial by or for another party or its representative."). Cours have been clear that documents pertaining to legislation cannot be withheld on the basis of attorney work product because: Whe legislation cannot be withheld on the basis of attorney work product because: Whe legislation cannot be withheld on the basis of attorney work product because: Whe legislation cannot be withheld on the basis of attorney work product because: When legislative process." All (internal edits omitted) (quoting Baldulas v. Bermann, 2011 W. G. 354564, at °2 (E.D. Wis. Dec. 20, 2011)). The "redistricting process" is a quintessential legislative function through its excurs every 10 years. As a result, the "the driving force behind the preparation of this document" is for legislation, not litigation. Nart Union for Ins. Co. of Pittsburgh v. Maurray Sheet Metal Co. 967 E. 24 980, 984 (4th Cir. 1992). This would not include "buisness or technical advisor management decisions." Pere v. Perry, 2014 W. 13 359324, at "1 (W.D. Tx. July 9, 2014) (citations omitted). Rule 26 Advisory Comm.'s Notes to 1970 amendment ("Materials assembled in the ordinary course of business, or pursuant to public requirements unrelated to litigation, or for other nonlingiation purposes are not under the qualified immunity provided by this subdivision.").
56	REL00020453	Work Product	10/1/2021	copiergise statehouse, gov	Emma Dean		Scanned image from MX-6070N	Scan transmission for staff counsel file.	This document is not attonicy work product. It was not draft in "ancipation of litigation" but over the "ordinary course of "legislation. Berlium-Hill v In Sura Bed of Election, 114 F. Supp. 3d 323, 345 (E. D. V. 2015) (quoting Hickmann v. Tuplor, 329 U.S., 508-10 (1947)); see Fed I. R. Civ. P. 26(b)(3) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of litigation or for trait by or for another party or its representative." Cours have been clear that documents pertaining to legislation cannot be withheld on the basis of attonicy work product because "the legislature could always have a reasonable belief atta any of its enactments would result in litigation. That is the nature of the legislation process." Id. (internal cidis omitted) (quoting Baldas v. Breman, 2011 WL 635645, at *2 (E.D. Wis. Dec. 20, 2011)). The "redistricting process" is a quintessential legislative function even though it occurs every 10 years. As a result, the "the driving force behind the preparation of" this document" is for legislation, not litigation with the "the process" of the process of the proces
57	REL00020453.0001	Work Product	10/1/2021				BL302Copier_20211001_162239.pdf	Scan for staff counsel file (scan of Row 1 on this Log).	This document is not attorney work product. It was not draft in "ancipation of litigation" but over the "ordinary course of" legislation. Bethun- Hill v I waster Bd. of Election., 114 F. Supp. 3d 323, 348 (E.D. Va. 2015) (quoting Hickman v. Taylor, 329 U.S., 508-10 (1947)); see Fed. R. Civ. P. 26(6)(3) (emphasis added, 104 the work product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of litigation or for trial by or for another party or its representative."). Cours have been clear that documents pertaining to legislation cannot be withheld on the basis of attorney work product because: "Bhe legislative cond abways have a reasonable belief that any of its enactments would result in litigation. That is the nature of the legislative process." Id. (internal clits omitted) (quoting Baldius v. Brennan, 2011 W. 10. S36454, at "E.C. D. Wis. Dec. 20, 2011). The "redistricting process." is a quintesential legislative frontion in the process of the
	REL00020716	Attorney-Client	11/18/2021	Elizabeth Taylor	Vic Dabney		RE: Amendment to the Redistricting	Confidential communication from legislator to legislative council	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only
58		Communication				Hinson	rian.	with questions regarding draft map and legislative process with response from legislative council to staff attorneys.	applies if, among other things, the person asserting the privilege is the client and the attorney is "acting as a lawyer." Bethinselful, 114 F. Supp. 3d at 346 (quoting United States v. Onne, 696 F2 d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between counsel and the legislator. Further, Hosse Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. Critzens Union of City of N.Y. v.dtry Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017).
	REL00020759	Attorney-Client	11/29/2021	Mark Smith	Emma Dean	Patrick Dennis	Re: Letter from Chairman Murphy	Confidential communication from legislator to staff counsel with	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only
59		Communication						questions regarding draft map and legislative process.	applies if, among other things, the person asserting the privilege is the client and the attorney is "acting as a lawyer." Bethinselful, 114 F. Supp. 3d at 34-6 (quoting United States v. Ones, 696 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between counsel and the legislator. Further, Hosse Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. Critzens Union of City of N.Y. v. Atry Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017).
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	Line Imber	Control Number	Privilege Type	Date	Email From	Email To	Email CC	Title	Privilege Description	Privilege Challenged Basis
	60	REL00020769	Work Product	11/29/2021	Thomas Hauger	Ashley Harwell-Beach	Emma Dean	RE: Redistricting Jefferson Amendment	Confidential communication from legislative staff to staff counsel with questions regarding draft map and legislative process.	This document is not attorney work product. It was not draft in "ancipation of litigation" but over the "ordinary course of Teglislation. Berlines" IIII V. You Suzu Boy (Electron, 114 E. Supp. a) 323, 344 (E. D. Va. 2015) (quoting Hickman, T. Teplor. a) 230, 580, 10 (1947)); see Fed. R. Civ. P. 26(N)3 (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are proposed in anticipation of litigation or of trial by or for another party or its representation." Courts have been clear that documents pertaining to legislation cannot be withheld on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its enamentes would result in litigation." That is the nature of the legislature process. If d. (internal cells committed) (quoting Buddas vs. Brenton, 2011 Wt. 6.88646, at *2 (E.D. Wis. Dec. 20, 2011)). The "redistricting process" is a quint-essential legislative function even though it excuss every 10 years. As a result, the "the driving force belieful the preparation of this document is for legislation, not litigation. Nat'l Union Far Ins. Co. of Ptathing's V. Marray Sheet Meata (a., 967 E.2d 980, 984 (4th Cir. 1992). This would not include "business or technical advice or management decisions." Perc. P. very, 2014 Wt. 3359324, at *1 (WD. T. Judy 9, 2014) (citians omittied), Euclidea Advisory Comm.'s Notes to 1970 amendment ("Materials assembled in the ordinary course of business, or pursuant to public requirements unrelated to litigation, or for other nonlitigation purposes are not under the qualified immunity provided by this subdivision.").
	61	REL00020770	Work Product	11/29/2021	Ashley Harwell-Beach	Thomas Hauger	Emma Dean	RE: Redistricting Jefferson Amendment	Confidential communication from staff counsel to legislative staff regarding draft map and legislative process.	Same
	62	REL00020775	Work Product	11/30/2021	Ashley Harwell-Beach	Thomas Hauger; Bonnie	Emma Dean	RE: Floor Amendments	Confidential communication from staff counsel to legislative staff	Same
	63	REL00020779	Work Product	11/30/2021	Ashley Harwell-Beach	Thomas Hauger; Bonnie	Emma Dean	RE: Floor Amendments	regarding draft map and legislative process. Confidential communication from staff counsel to legislative staff	Same
-		REL00020802	Work Product	11/30/2021	Thomas Hauger	Huth Ashley Harwell-Beach;	Emma Dean	RE: Floor Amendments	regarding draft map and legislative process. Confidential communication from legislative staff to staff counsel	Same
	64					Bonnie Huth			with questions regarding draft map and legislative process.	Salite
	65	REL00020808	Work Product	12/3/2021	Paula Benson	Patrick Dennis; Emma Dean Andy Fiffick	;	Language for Redistricting	Confidential communication between staff attorneys for House and Senate regarding legislative language.	Same
	66	REL00020808.0001	Work Product	12/3/2021				Language to Consider for SECTION 1 and for Litigation.docx	Confidential draft language shared with staff attorneys for House for review and comment.	Same
		REL00020814	Work Product	12/5/2021	Thomas Hauger	Ashley Harwell-Beach;		RE: Update to Murphy Amendment	Confidential communication from legislative staff to staff counsel	Same
	67					Patrick Dennis; Emma Dean			with update on amendment.	
	68	REL00020815	Work Product	12/5/2021	Ashley Harwell-Beach	Thomas Hauger; Patrick Dennis; Emma Dean		RE: Update to Murphy Amendment	Confidential communication from staff counsel to legislative staff responding to update about amendment.	Same
	69	REL00020817	Work Product	12/6/2021	Thomas Hauger	Ashley Harwell-Beach;		RE: Update to Murphy Amendment	Confidential communication from legislative staff to staff counsel	Same
						Patrick Dennis; Emma Dean			with update on amendment.	
	70	REL00020824	Attorney-Client Communication		Ashley Harwell-Beach	Thomas Hauger, Patrick Dennis; Emma Dean		RE: Update to Murphy Amendment	Confidential communication from staff counsel to legislative staff responding to update about amendment.	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only applies if, among other things, the person asserting the privilege is the client and the attorney is acting as a lawyer, **Pethum-Hill, 114 F. Supp. 3d at 346 (quoting **United **Nation**) of E2d (109), 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between counsel and the legislator. Further, Hosso Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. **Citizens Union of City of N.Y. v.Atry Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017). The latter would not be protected by the attorney client privilege. **Id.**
	71	REL00020927	Work Product	11/8/2021	Ashley Harwell-Beach	Emma Dean		Redistricting	Communication between staff counsel regarding internal process planning.	This document is not attorney work product. It was not draft in "ancipation of lingation" but over the "rotinary course of Tegislation. Bethins-lilly vs Suzuk do Pleterion, 114: Supp. 34.23, 34.8 (E. D. Va. 2015) (quoting Bichamar, Taplor, 3.20 US, 508-10 (1947)); see Fed R. C. Vr. P. 26(b)(3) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are propared in anticipation of liningation of or trail by or for another party or its representative."). Courts have been caler that documents pertaining to legislation cannot be withheld on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its enactments would result in linitgation. That is the nature of the legislative process" is a quintessential legislative function even though it occurs every 10 years. As a result, the "the driving force behind the preparation of "this document" is for legislation, not linitgation. Art "I chinn fire lists. Co. of Pithsburgh's Marray Sheet Metal Co., 967 F.2d 980, 984 (4th Cir. 1922). This would not include "business or technical advice or management decisions." Pere v. Perry, 70.14 WIL 339324, at *1 (WD. 73. July 9, 2014) (clainso smitted); Relace 26 Advisory Comm.'s Notes to 1970 amendment ("Materials assembled in the ordinary course of business, or pursuant to public requirements unrelated to litigation, or for other nonlitigation purposes are not under the qualified in mining provided by this subdivision.").

					Amended Privilege Lo	g of House Defendants		-	
Line	Control Number	Privilege Type	Date	Email From	Email To	Email CC	Title	Privilege Description	Privilege Challenged Basis
72	REL00021323	Attorney-Client Communication; Work Product		Emma Dean	Chris Murphy		Attorney Communication Privileged	product response to public letter for review.	An attomy-client relationship does not exist among the individuals in the email. The attomey-client privilege is "narrowly construed" and only applies if, among other things, the person asserting the privilege is the client and the attomey; "senting as a lawyer," Behume-Hill, 14 F. Supp. 3d at 346 (quoting United States v. Jones, 608 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. Cultimes Union of Cir. 19 N.Y. v.Atr.) Gen. of N.Y., 260 F. Supp. 3d 124, 171 (S.D.N.Y. 2017). This document is not attorney work product. It was not draft in "ancipation of tiligation" but over the "ordinary course of "legislation" but State Bed. of Election, 114 F. Supp. 3d 233, 348 (E.D. V. 2015) (quoting Hickman v. Taylor, 329 U.S., 508-10 (1947)); see Fed. R. Civ. P. 26(b)(3) (emphasis added) (the work product produc
73	REL00021323.0003	Attorney-Client Communication; Work Product	9/3/2021				Draft Letter from Ch. Murphy 9.3.21.docx	Attachment to attorney communication to client with draft work product response to public letter for client's review.	Same
74	REL00021658	Autorney-Client Communication	7/19/2021	Emma Dean	Chris Murphy		RE: 7.21.21 Draft letter	Confidential communication from attorney to client with draft work product response to public letter for review.	An attorney client relationship does not exist among the individuals in the ensul. The attorney-client privilege is "narrowly constructed" and only applies if, among other things, the person ascerting the privilege is the client and the attorney, is "neing as a lawyer" Rehtune-Hill, 114 F. Supp. 3d at 346 (quoting United States v. Annes, 606 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that attorney-client relationship exists between counsel and the legislator. Further, House Defendants have not produced a retainer stating that attorney-client relationship exists between counsel and the legislator. Further, House Defendants fail to provide sufficient evidence that the legislator further, House Defendants fail to provide sufficient evidence that the legislator further, House Defendants fail to provide sufficient evidence that the legislator further, House Defendants fail to provide sufficient evidence that the legislator further, House Defendants fail to provide sufficient evidence that the legislator further, House Defendants fail to provide sufficient evidence that the legislator further, House Defendants fail to provide sufficient evidence that the legislator further. House Defendants have not produced a retainer stating that the legislator further have been applied to the legislator further. House Defendants fail to provide a further stating that the legislator further have been always and the legislator
75	REL00023916	Attorney-Client Communication	7/20/2021	Chris Murphy	Emma Dean	Patrick Dennis; Jay Jordan	Re: 7.21.21 Draft letter	Confidential communication from legislator to staff counsel with questions regarding draft map and legislative process.	Same
76	REL00027893	Attorney-Client Communication	8/10/2021	Patrick Dennis	Richard Pearce		Untitled Document	Confidential communication between staff counsel regarding redistricting update.	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is "marrowly constructed" and only applies if, among other things, the person ascerting the privilege is the client and the attorney; "acting as a lawyer," <i>Bethunc-Hill</i> . 14 F Supp. 3d at 346 (quoting United States v. Jones, 696 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between course and the legislator. Further, House Defendants fail to provide sufficient evidence to determine if this communication was for the preclorating tempore of legal advice rather than policy advice. Citizens Union of City of N.Y. v. dtry Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017). The latter would not be protected by the attorney client privilege. Id.
77	REL00028185	Attorney-Client Communication; Work Product		Patrick Dennis	Jay Lucas; Patrick Dennis; Haley Mottel		Sinc Die Adjourment	Confidential communication between staff counsel and legislator with attorny legal advice, mental impressions, and opinions regarding legislative procedure.	An attoricy client relationship does not exist among the individuals in the ensul. The attoricy-client privilege is "narrowly constructed" and only upplies if, among other things, the person ascerting the privilege is the client and the attoring; is "netting as a lawyer," <i>Berliang Salaysia, "Berliang Salaysia," Berliang Salaysia, "Berliang Salaysia," Berliang Salaysia, "Berliang Salaysia, "Berliang Salaysia, "Berliang Salaysia, "Berliang Salaysia, "Berliang Salaysia," and the client person of the protein propose of legal advice rather than policy advice. Citizen Union of City of N.V. 447; Gen. of N.Y. 249, "Berliang Salaysia," and the construction was for the prodominate purpose of legal advice rather than policy advice. Citizen Union of City of N.V. 447; Gen. of N.Y. 249, "Berliang Salaysia," and the construction of the prodominate purpose of legal advice rather than policy advice. Citizen Union of City of N.V. 447; Gen. of Salaysia, "Berliang Salaysia," and the state of the construction o</i>
78	REL00028205	Attorney-Client Communication	9/28/2021	Patrick Dennis	Rep. Bill Taylor		Fwd: Sine Die Adjourment	Confidential communication between staff counsel and legislator with attorney legal advise, mental impressions, and opinions regarding legislative procedure.	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is marrowly constructed and only applies if, among other things, the person asserting the privilege is the client and the attorney; is "enting as a lawyer." Rehume-Hill. 11 H.F. Supp. 3d at 346 (quoting United States v. Jones, 696 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between counsel and the legislator. Further, House Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. Citizens Union of City of N.Y. v.Atty Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017). The latter would not be protected by the attorney client privilege. Id.
79	REL00028206	Attorney-Client Communication	9/28/2021	Patrick Dennis	Rep. Bill Taylor		FW: Sine Die Adjourment	Confidential communication between staff counsel and legislator with attorney legal advice, mental impressions, and opinions	Same

					Amended Privilege Log of House Defendants			
Line Number	Control Number	Privilege Type	Date	Email From	Email To Email CC	Title	Privilege Description	Privilege Challenged Basis
80	REL00028249	Attorney-Client Communication	10/12/2021	Patrick Dennis	Jay Lucas; Haley Mottel	Lawsuit Over South Carolina Redistricting Failures	Confidential communication from counsel regarding complaint and litigation process.	An attorney client relationship does not exist among the individuals in the ennall. The attorney-client privilege is 'narrowly construet" and only applies if, among other things, the person asserting the privilege is the client and the attorney; is "exiting as a lawys". Behunse-Hill, 114 F. Supp. 3d at 346 (quoting United States v. Jones, 606 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between counsel and the Egislator. Further, House Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. Citizens Union of City of N.Y. v.Atty Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017). The latter would not be protected by the attorney client privilege. Id.
81	REL00028277	Attoracy-Client Communication; Work Product	10/15/2021	Patrick Dennis	Nicolette Walters	RE: Zak Koeske Qs	containing attorney's mental impressions and opinions regarding media questions.	An atmore y client relationship does not exist among the individuals in the cmail. The atmorey-client privilege is "narrowly construct" and only applies if, among other things, the person ascerting the privilege is the client and the attorney; setting as a lawyer. Bethuse-Hill, 114 F. Supp. 3d at 346 (quoting United States v. Jones. 696 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between conusel and the legislator. Further, House Defendants have not produced a retainer stating that an attorney-client relationship exists between conusel and the legislator. Further, House Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice rather than policy advice. Citiezus Union of City of NJ. 4x1/ Gen. of Y. 7, 269, F. Supp. 3d 124, 171 (ED. DN. Y. 2017). The latter would not be protected by the attemped either privilege. Id. This document is not attorney work product. It was not draft in "ancipation of litigation" but over the "ordinary course of" legislation. Bethum-Hill v. Va State Bd. of Election, 114 F. Supp. 3d 232, 348 (ED. Va. 2015) (quoting Hickman v. Taylor, 25 U. Sp. 86.1 (1947)); See Feld. R. Civ. P. 26(b)(3) (emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of litigation or for trial by or for another party or its representative."). Cours has we been clear that documents pertaining to legislation cannot be withheld on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its exaction of the second of the segulative process." Id. (internal edits omitted) (quoting Balduss v. Hernana, 2011 WL 6385645, at *2 (ED. Wis. Dec. 20, 2011)). The "redistricting process" is a quintessential legislative function even though the course every 10 years. As a result, the "the driving force behind the preparation of th
82	REL00028278	Attorney-Client Communication; Work	10/15/2021	Patrick Dennis	Haley Mottel	FW: Zak Koeske Qs	containing attorney's mental impressions and opinions regarding media questions.	Same
-	REI 00028413	Product Attorney-Client	11/17/2021	Patrick Dennis	Charles Reid	RE: Speaker Lucas Calling the House	Confidential communication between staff counsel with draft email	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only
83		Communication; Work Product				into Statewide Session Beginning 2:00 pm, Wednesday, December 1, 2021	language asking for attorney's mental impressions and opinion regarding legislative procedure.	applies if, among other things, the person asserting the privilege is the client and the attorney is "acting as a lawyer." Bethune-Hill, 114 F. Supp. 3d at 346 (quoting United States v. None, 509 F.21 dloop, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between counsel and the legislator. Further, House Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legal advice nether than policy advice. Citizens Union of City of N.Y., 247 (Sen. of N.Y., 269) F. Supp. 3d 124, 171 (S.D.N.Y. 2017). The latter would not be protected by the attorney cell reprivilege. Id. This document is not attorney work product. It was not furth in "ancipation of litigation" but over the "ordinary course of "legislation. Bethune-Hill V. NS Satte Bd. of Election, 114 F. Supp. 3d 233, 348 (E.D. Vz. 2015) (quoting Hickman v. Taylor, 229 U.S., 508-10 (1947)); see Fed. R. Civ. P. 26(b)(3) (emphasis added) (the work product protection is a qualified privilege for "documents and tangible things that are prepared in anticipation of litigation or for trial by or for another party or its representative."). Courts have been clear that documents pertaining to the legislation cannot be withheld on the basis of attorney work product because "the legislation could always have a reasonable belief that any of its enactments would result in litigation. That is the nature of the legislative process." Hd. (internal edits omitted) (quoting Baldas v. Brennan, 2011 U. C. 355-65, 43 or 20. 2011). The "revisativing process." Id. (internal edits omitted) (quoting Baldas v. Brennan, 2011 U. C. 355-65, 43 or 20. 2011). The "diving force behind the preparation of this document is for legislation, not Illigation. Nart Union fire las. Co. of Pt. 24 900, 98 (44 th Cir. 1929). This would not include "business or technical advice or management decisions." Perez v. Perry, 2014 V.W. 3359324, at " (IV.D. Tx. July 9, 2014) (citations omitte
84	REL00028439	Attorney-Client Communication; Work Product		Patrick Dennis	Ashley Harwell-Beach; Charles Reid	RE: Rules Committee - Special Order Redistricting	Confidential communication between staff counsel regarding legislative drafting.	Same
85	REL00028440	Attorney-Client Communication; Work Product		Patrick Dennis	Charles Reid; Ashley Harwell- Beach	RE: Rules Committee - Special Order Redistricting	Confidential communication between staff counsel regarding legislative drafting.	Same
86	REL00028510	Attorney-Client Communication; Work Product		Patrick Dennis	Julia Foster	' Untitled Document	Confidential communication between staff counsel regarding legislative drafting.	Same
87	REL00028510.0001	Attorney-Client Communication; Work Product	12/8/2021			7524AHB21.pdf	Attachment to communication between staff counsel with draft legislative language.	Same
88	REL00028564	Attorney-Client Communication; Work Product	12/8/2021	Patrick Dennis	Julia Foster	FW: Special Order Draft	Confidential communication between staff counsel regarding legislative drafting.	Same
89	REL00028564.0001	Attorney-Client Communication; Work Product	12/8/2021			7524AHB21.doex	Attachment to communication between staff counsel with draft legislative language.	Same
90	REL00029117	Product Attorney-Client Communication	7/19/2021	Patrick Dennis	Charles Reid; Haley Mottel; Nicolette Walters	RE: reapportionment expenses	Confidential communication among staff counsel and legislative staff regarding response to media request for information.	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only applies if, among other things, the person asserting the privilege is the client and the attorney is "acting as a lawyer." Bethinsel-Hill, 114 F. Supp. 3d at 346 (quoting United States v.) most, 690 F.21 (040), 1072 (461 ft.; 1982)). House Defendants have not produced a retainer stating that an attorney-client relationship exists between counsel and the legislator. Further, House Defendants fail to provide sufficient evidence to determine if this communication was for the predominate purpose of legislatoire enthre than policy advice. Citizent Ninoi of Urio y N.Y. Avity Gen. of N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017). The latter would not be protected by the attorney client privilege. Mr. Further, entries involving media inquiries (Log nos 8, 18, 29) on a finally not covered by the attorney client privilege. See In resigned Jewelset List, Sees. Life, 332 F.R.D. 131, 136 (S.D.N.Y. 2019); Lauth Group, Inc. v. Grasso, No. 1:07-ev-0972-SEB-TAB, 2008 WL 926631, at *4 (S.D. Ind. Apr. 4, 2008) (quoting City of Springfield v. Rexnord Corp., 196 F.R.D. 7, 9 (D. Mass. 2000))

Line	Control Number	Privilege Type	Date	Email From	Email To	Email CC	Title	Privilege Description	
Number	Control Number	rrivilege Type	Date	Eman From	Eman 10	Eman CC	Title	Privilege Description	Privilege Challenged Basis
Number	REL00029130	Attorney-Client	7/22/2021	Patrick Dennis	Charles Cannon: Garv	Patrick Dennis	DRAFT email about retreat	Confidential communication among staff counsel and legislator	Comp
91	KEL00029130	Communication	//23/2021	ratrick Delinis	Simrill	Patrick Dennis	DKAF I citati about fetreat	with draft notice to caucus members.	Same
-	REL00033189	Attorney-Client	10/14/2021	Roland Franklin	Chip Huggins		Census Numbers	Confidential communication from staff counsel to legislator	Comp
92	KEL00033189		10/14/2021	Roland Franklin	Cnip riuggins		Census Numbers		Same
	REL00034495	Communication	12/2/2021	4 11 17 11 11 11	and an		DE D. L.L.A. L.	responding to inquiry about appeal rights.	
	REL00034495	Attorney-Client	12/2/2021	Ashley Harwell-Beach	Thomas Hauger		RE: Brawley's Amendments	Confidential communication among legislative staff and staff	An attorney client relationship does not exist among the individuals in the email. The attorney-client privilege is "narrowly construed" and only
		Communication; Work						counsel regarding legislative amendment process.	applies if, among other things, the person asserting the privilege is the client and the attorney is "acting as a lawyer." Bethune-Hill, 114 F. Supp.
		Product							3d at 346 (quoting United States v. Jones, 696 F.2d 1069, 1072 (4th Cir. 1982)). House Defendants have not produced a retainer stating that an
									attorney-client relationship exists between counsel and the legislator. Further, Hosue Defendants fail to provide sufficient evidence to determine
									if this communication was for the predominate purpose of legal advice rather than policy advice. Citizens Union of City of N.Y. v.Att'y Gen. of
									N.Y., 269, F. Supp. 3d 124, 171 (S.D.N.Y. 2017). The latter would not be protected by the attorney client privilege. Id. This document is not
									attorney work product. It was not draft in "ancipation of litigation" but over the "ordinary course of" legislation. Bethune-Hill v. Va State Bd.
									of Election, 114 F. Supp. 3d 323, 348 (E.D. Va. 2015) (quoting Hickman v. Taylor, 329 U.S, 508-10 (1947)); see Fed. R. Civ. P. 26(b)(3)
									(emphasis added) (the work product product protection is a qualified privilege for "documents and tangible things that are prepared in
									anticipation of litigation or for trial by or for another party or its representative."). Courts have been clear that documents pertaining to
									legislation cannot be withheld on the basis of attorney work product because "the legislature could always have a reasonable belief that any of its
									enactments would result in litigation. That is the nature of the legislative process." Id. (internal edits omitted) (quoting Baldus v. Brennan, 2011
									WL 6385645, at *2 (E.D. Wis. Dec. 20, 2011)). The "redistricting process" is a quintessential legislative function even though it occurs every
93									10 years. As a result, the "the driving force behind the preparation of" this document" is for legislation, not litigation. Nat't Union fire Ins. Co.
									of Pittsburgh v. Murray Sheet Metal Co., 967 F.2d 980, 984 (4th Cir. 1992). This would not include "buisness or technical advice or
									management decisions." Perez v. Perry, 2014 WL 3359324, at *1 (W.D. Tx. July 9, 2014) (citaions omitted); Rule 26 Advisory Comm.'s Notes
									to 1970 amendment ("Materials assembled in the ordinary course of business, or pursuant to public requirements unrelated to litigation, or for
									other nonlitigation purposes are not under the qualified immunity provided by this subdivision.").
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